

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KIMBERLY M. O'NEAL,

Plaintiff,

V.

KING COUNTY and KING COUNTY SOUND TRANSIT LIGHT RAIL and JOHN AND JANE DOES 1-10,

## Defendants.

No. 2:24-cv-00682-RSL

STIPULATED MOTION AND  
ORDER TO EXTEND TRIAL  
DATE AND REMAINING  
RELATED DEADLINES

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff Kimberly M. O’Neal and Defendant King County and King County Metro Transit (collectively, the “Parties”) submit this stipulated motion to extend the remaining case deadlines in the Court’s Order Setting Trial Date & Related Dates (Dkt. #11; the “Case Scheduling Order”).

## **I. AUTHORITY**

Under Federal Rule of Civil Procedure 16(b)(4), the Court may amend a scheduling order upon a showing of good cause. To date, the Parties have engaged in cooperative efforts to complete discovery, including exchanging expert reports, written interrogatories, and requests for production. Good cause exists to continue the Case Scheduling Order because both Parties require additional time to conduct depositions and complete discovery beyond the current deadline. In

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1 addition, the Parties have scheduling conflicts, that would make an extension of shorter duration  
 2 difficult, including trial in other cases scheduled to begin on September 22, October 6, November  
 3, November 10, December 8, and January 5

4 **II. STIPULATION**

5 For the reasons stated above, the Parties respectfully request that the Court extend the  
 6 remaining case scheduling deadlines in the Case Scheduling Order, as follows:

Case Event	Current Event Date	Proposed Amended Date
Discovery completed by	May 12, 2025	November 10, 2025 <sup>1</sup>
Settlement conference held no later than	May 27, 2025	November 25, 2025
All dispositive motions must be filed by and noted on the motion calendar for no earlier than twenty-eight days after filing (see LCR 7(d)(4))	June 10, 2025	December 9, 2025
All motions in limine must be filed by and noted on the motion calendar for no earlier than fourteen days after filing. Replies will be accepted	August 11, 2025	February 9, 2026
Agreed pretrial order due	August 27, 2025	February 25, 2026
Trial briefs and trial exhibits due	September 3, 2025	March 4, 2026
Trial Date	September 8, 2025	March 9, 2026

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 25 <sup>1</sup> All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d) or LCR 37(a)(2) no  
 26 later than the Friday before discovery closes.

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2 STIPULATED to this 24th day of April, 2025.  
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PACIFICA LAW GROUP LLP

5 s/ Ian D. Rogers

6 Ian D. Rogers, WSBA #46584  
7 Zachary J. Pekelis, WSBA #44557  
8 Luther Reed-Caulkins, WSBA #62513  
9 Special Deputy Prosecuting Attorneys for  
Attorneys for Defendants King County and  
King County Metro Transit

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5 s/ Harold H. Franklin, Jr.

6 Harold H. Franklin, Jr., WSBA #20486  
7 Tracy Tribbett, WSBA #35922  
8 Attorney for Plaintiff

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11 IT IS SO ORDERED.  
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13 DATED this day of 25th, 2025.  
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16 Robert S. Lasnik  
17 United States District Judge  
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27 STIPULATED MOTION AND ORDER TO EXTEND  
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